Feedback & Complaints Procedures 2026

Applies to: Staff and volunteers	**Version:** 1
Specific responsibility: CEO	**Date approved:**
To be uploaded to website: No	**Next review date:**

Context of Procedures:

Standards or other external requirements:	• Risk Management Guide • National Accreditation Scheme • WRC Enterprise Agreement
Legislation or other requirements:	• Legal Profession Uniform Law (NSW) • WRC Enterprise Agreement • Racial Discrimination Act 1975 (Cth) • Sex Discrimination Act 1984 (Cth) • Disability Discrimination Act 1992 (Cth) • Age Discrimination Act 2004 (Cth) • Equal Opportunity for Women in the Workplace Act 1999 (Cth) • Anti-Discrimination Act 1977 (NSW)
Contractual obligations:	• Client Agreement

Introduction

Welfare Rights Centre ("WRC") is committed to maintaining clear procedures for how clients and other members of the public can provide feedback or make a complaint about WRC and the procedures to be followed in responding to a complaint. These Procedures are for internal use only.

Definitions

In these Procedures the following definitions are used:

"Complainant" refers to any person who contacts WRC to obtain help with a legal problem, or attends or wishes to attend a community legal education session, or accesses WRC website or social media posts, and subsequently makes a complaint to WRC.

"Complaints Form" refers to the online, pdf and hard copy form that is sent to potential complainants as a link, attachment or through the post after WRC has been contacted about making a complaint.

"Complaint handler" refer to the staff member, usually the CEO, CEM or the Principal Solicitor, responsible for receiving, investigating and resolving a formal complaint.

"Feedback & complaints online form" refers to the form available on WRC'swebsite for providing feedback or initiating a complaint.

"Formal complaint" refers to a complaint received or recorded in the complaints form.

"Solicitor/Caseworker" refers to any person who works in a paid or unpaid capacity as a solicitor or caseworker at WRC;

"Supervisor" refers to any staff member who is responsible for supervising the volunteer or staff member the subject of the complaint. For volunteers, this will usually be the intake officer, the office administrator, troubleshooter or clinic supervisor. For staff members, this will usually be the Principal Solicitor, Office Manager, CEM or the CEO.

"Volunteer" refers to any unpaid worker at WRC, including student volunteers, volunteers answering phones, PLT and social work students, but excludes pro bono and volunteer solicitors.

Response to positive feedback

Where a client has provided positive feedback to WRC about its services, permission should be sought to quote the client in WRC Annual Report and other publications. If the client consents to the publication of their comments, they may do so anonymously.

Capturing and recording positive feedback

Clients and other service users may provide positive feedback to WRC at any time by using the feedback & complaints online form available on WRC's website, which will be emailed to the CEO and the Principal Solicitor.

These emails and any further correspondence (e.g. to obtain consent) should be saved in Administration\Impact evaluation project\Positive feedback.

Avenues for making a complaint

It is anticipated that most complaints will be initiated via the online form on WRC's website, with the remainder received by email or telephone. In all cases, once the complaint is received, the client will be sent the Complaints Form to complete, which will be available as an online form that can be sent as a link and in hard copy.

Written complaints

WRC's website will include information about how to provide feedback or make a complaint and provide options for submitting the complaint, which will include a short website inquiry form and dedicated email address (feedback@welfarerights.org.au) that will only be accessible by the CEO and the Principal Solicitor. If a complaint is received via the post, it should be placed in the Principal Solicitor's pigeonhole.

Verbal complaints

Where a complainant wishes to make their complaint verbally, staff should use the online Complaints Form to guide their questions about the complaint and to record the complainant's responses.

Information sent to complainants

Where required, the complainant will be sent via email or the post:

- the Feedback & Complaints Policy;
- a summary of the complaints process and procedures (see Appendix A); and
- the Complaints Form as a link in an email or in hard copy (see Appendix B).

Procedures for managing and resolving complaints

Attempts will be made to resolve complaints informally. If complaints cannot be resolved informally, the formal complaint procedures apply.

Where clients and callers to WRC are becoming aggressive and/or abusive, volunteers and staff members are not required to follow these procedures and must follow the Staff Safety Guidelines Policy.

Informal resolution of complaints

These steps apply to both staff members and volunteers where a client is dissatisfied with the staff member or volunteer's conduct and wishes to make a complaint.

Step 1: The complainant will be placed on hold, or will be asked to wait in the foyer, interview room or meeting room, while the staff member/volunteer talks to their supervisor about the issue.

Step 2: The supervisor will guide the staff member/volunteer in how to resolve the issue with the complainant.

Step 3: If appropriate or if the issue is not resolved, the supervisor will take over the call or talk to the client face-to-face to resolve the issue.

Step 4: If the complaint is not resolved, the supervisor will arrange for the complainant to be sent:

- The Feedback & Complaints Policy;
- The "How to make a complaint" document; and
- The Complaints Form.

Step 5: For advice or case work related complaints. The supervisor will **record in the relevant ActionStep matter the details** of the issue and if and how it was resolved.

Formal resolution of complaint

These steps apply where the CEO or Principal Solicitor (CEO/PS) has received an email from WRC website initiating a complaint or has otherwise become aware that a client would like to make a formal complaint. The Principal Solicitor and the CEO will discuss and agree on which of them should handle the complaint.

Step 1: Within **2 days of the client initiating the complaint**, the CEO/PS will arrange for the complainant to be sent:

- The Feedback & Complaints Policy;
- The "How to make a complaint" document (see **Appendix A**); and
- The Complaints Form (see **Appendix B**).

If the complainant would **prefer not to make the complaint in writing**, the CEO/PS will contact the complainant to explain the complaints process and procedures and offer to complete the form at that time or arrange for another staff member to contact them to record the complaint.

Step 2: Within **two working days** of receiving the Complaint Form, the CEO/PS will acknowledge receipt of the complaint via email, post or a phone call, and will save the Complaint Form in the Complaints folder.

The CEO/PS may contact the complainant for more details if the Complaint Form lacks detail or the nature of the complaint is not clear, using an interpreter if necessary.

Step 3: Within **five working days** of receiving the Complaints Form, the CEO/PS will inform the staff member or volunteer (if the volunteer is known) of the complaint and seek further information about the circumstances surrounding the complaint.

Step 4: Within **ten working days** of receiving the Complaint Form, the CEO/PS will discuss with the CEO or Principal Solicitor (as appropriate) their proposed resolution of the complaint and prepare a letter to the complainant (see **Appendix C** for a template letter) which sets out the proposed resolution of the complaint for CEO/PS to review.

Step 5: Within **12 working days** of receiving the Complaints Form, and where appropriate, the CEO/PS will discuss with the staff member/volunteer how they intend to resolve the complaint.

Step 6: Within **15 working days** of receiving the Complaints form, the CEO/PS will send a letter to the complainant and save the letter in the Complaints folder (see **Appendix C** for template letter).

Step 7: The CEO/PS will **record the outcome of the complaint** in the **Complaints Register** and for advice and casework complaints, enter a note in the client details page in **Actionstep** and flag the client so that future volunteers and staff members are aware that a complaint was made and how it was resolved.

Note: the above timeframes may be adjusted by mutual agreement between the complainant and WRC

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Response to complaints

Findings on formal complaints

The complaint handler needs to decide on the balance of probabilities whether the substance of the complaint is true, that is whether:

- the complaint refers to a true event; or
- the events described by the complainant did not in fact occur.

For example, if the complaint is about the refusal to make an appointment, the complaint handler will decide whether in fact there had been a refusal to make an appointment for the client.

Note: Where the complaint relates to a staff member or a volunteer's attitude or behaviour, the complaint handler need only establish that there was an interaction between the complainant and the particular staff member or volunteer.

Resolution of formal complaints

The resolution of a formal complaint will depend on whether the events described by the complainant in fact occurred. In all complaints, the Principal Solicitor will need to consider the implications for WRC Professional Indemnity Insurance (PII) and whether the complaint requires notification to the insurer.

Complaint refers to a true event

Where the events described in the complaint are found to be true, the complaint may be resolved by:

- Apologising to the complainant (subject to PII requirements); and/or
- Providing an explanation of the circumstances to the complainant; and/or
- Outlining the steps that have been or will be taken to address the issue raised.

Examples of resolutions:

- Apologising to the complainant for the way a staff member or volunteer has spoken to the complainant and informing them that the staff member or volunteer has been counselled/offered training.
- Explaining that the complainant wasn't offered an appointment for legal advice because WRC is at capacity but that the client is welcome to re-contact in three weeks.
- Providing correct or complete advice.
- Removing a social media post or amending training materials

Events described did not occur

Where the events described by the complainant are found not to have occurred, the complaint may be resolved by:

- Offering an explanation of WRCs view of the events described; and/or
- Informing the complainant that no action will be taken; and/or
- Providing information to the complainant about avenues available for making an external complaint.

Examples of resolutions:

- In response to a complaint that we did not consider their matter for representation, explaining to the complainant that their matter was considered at a casework meeting on a particular date but a decision was made not to represent the client due to lack of merit or capacity.
- Reassurance to the client that the advice provided was correct.

Complaints against the Principal Solicitor or CEO

If the initial complaint is against the Principal Solicitor, the CEO will manage the complaint using the above procedures.

If the complaint is against the CEO, in their capacity as a solicitor, the Principal Solicitor will manage the complaint using the above procedures. If the complaint is about the CEO in their capacity as CEO, the complaint will be referred to the Chair of WRC's Board.

Breach of Code of Ethics & Conduct Agreement

Where a staff member is found to have breached WRCs Code of Ethics & Conduct Agreement in relation to a complaint, the provisions of the Enterprise Agreement will apply and a record will be made in the staff member's personnel file.

Where a volunteer is found to have breached the Code of Ethics & Conduct Agreement, they may not be permitted to continue to volunteer at WRC and a record will be made in the Complaints Register.

Complaints Register

An electronic register of complaints and appeals will be kept in in the Management folder In WRCs file tree. The register will be maintained by the CEO and the Principal Solicitor and will record the following for each complaint or appeal:

- Details of the complainant and the nature of the complaint;
- If relevant, the name of the staff member or volunteer subject of the complaint;
- Date lodged;
- Action taken;
- Date of resolution and reason for decision;
- Indication of complainant being notified of outcome; and
- Complainant response and any further action.

Copies of all correspondence and the complaints register and files will be confidential and access is restricted to the CEO and the Principal Solicitor. The Principal Solicitor will provide to the Board reports on complaints and how they have been resolved.

Documents relating to this Procedure

Related policies & procedures	Feedback & Complaints Policy Privacy & Information Access Policy Advice & Casework Policy Advice & Casework Procedures Staff and Volunteer Code of Ethics & Conduct Agreement
Forms, record keeping\or other organisational documents	Complaints Register How to make a Complaint Complaints form

Reviewing and approving this policy		
Frequency	**Person responsible**	**Approval**
Every 3 years	Centre Manager	CEO

Policy review and version tracking			
Review	**Date Approved**	**Approved by**	**Next Review Due**
1	30 August 2022	Executive Director	August 2025
2	28 August 2026	CEO	August 2029
3			

Appendix A: Plain English guide to making a complaint

Note: The below text (with refinements as necessary) will be sent in the form of a pdf document or as a hard copy document where a client has initiated a complaint.

How to make a complaint about Welfare Rights Centre's service

This document explains to make a complaint about our services, to send your comlaint, and what we will do after we receive it.

How do I make a complaint about Welfare Rights Centre?

You can make a complaint by completing our Complaints Form. We will send the Complaints Form to you as a link to an online form. You can also ask us to send it to you as a

- Word document,
- PDF, or
- printed copy.

The form will ask you for details about what happened and any suggestions you have for resolving the complaint.

If you need support to make a complaint, or you cannot use the online form, call us on 02 9211 5389.We can help you record your complaint and can arrange a free interpreter

We will keep information about your complaint confidential and will only share it with people within Welfare Rights Centre who need the information to respond to your complaint.

Where do I send my Complaint Form?

If you complete the online Complaints Form, just click 'submit'. You can also complete the pdf form and email it to feedback@welfarerights.org.au. You can also send a hard copy of the Complaints Form to 102/55 Holt Street, Surry Hills NSW 2010.

A senior staff member at Welfare Rights Centre will receive and manage your complaint. If your complaint is about that staff member, another appropriate person will manage it.

What will happen with my complaint?

Within two working days of you initiating your complaint, we will:

- send you our Feedback and Complaints Policy
- Send you information about our complaints process (this document)
- Send you the Complaints Form to complete

Within two working days of receiving your Complaints Form, we will:

- acknowledge receipt via email, post or a phone call, and
- Commence investigating the complaint

Within 15 working days of receiving your Complaints Form, we will send you a letter about your complaint:

- Explaining what we have found, whether we have upheld your complaint and what action we have taken or will take, or
- providing information about the circumstances that led to your complaint, or
- explaining why no further action will be taken, and
- informing you of options for further action you may take, if you are not satisfied with the outcome of your complaint.

If you are not satisfied with the resolution of your complaint, you may be able to raise your concerns with one of the organisations below. The appropriate organisation will depend on what your complaint is about:

- the Office of the Legal Services Commissioner, ph: 1800 242 958
- the Office of the Australian Information Commissioner: https://www.oaic.gov.au/
- Legal Aid NSW: clcprogram@legalaid.nsw.gov.au

Appendix B: Complaints Form

Note: online, pdf and hard copy form that is sent to clients as a link, attachment or through the post after the Centre has been contacted about making a complaint

Name:

Address:

Phone: Mobile:

Email address:

What is your complaint about?

What date did the problem occur?

If your complaint is about a particular staff member or volunteer, what is their name? (If you do not know their name please provide as much information as possible to help us identify the volunteer or staff member)

Do you have any suggestions for resolving the complaint or improving Centre's service?

Appendix C: Template letter

Note: this template may be used for responding to complaints. It should copied and pasted into the letters template and adjusted accordingly.

Dear [complainant's name],

Re: Your complaint to the Centre

I received your complaint about [very brief description of complaint] on [date]. This letter sets out my resolution of your complaint. If you are not satisfied with this resolution, more information about your options is at the end of this letter.

Your complaint

You complained that [more complete description based on complainant's words in the Complaints Form].

You proposed that your complaint be resolved by [description of complainant's suggested resolution as set out in the Complaints Form].

Investigation of the complaint

In my investigation of your complaint, I have taken account of the following information: [add/delete as appropriate]

- Your completed Complaints Form;
- What you told me when we spoke on [date];
- What the volunteer/staff member told me;
- The records held in our database
- Add further items as appropriate

I have found that:

- [List the facts you have established following the investigation of the complaint]

Response to your complaint

After investigating your complaint, I have decided that your complaint should be upheld. I have [action taken to resolve the complaint, e.g. staff member/volunteer counselled, new appointment made, case opened, procedures/policy changed etc]. Thanks you for bringing this issue to our attention.

OR

After investigating your complaint, I have decided that your complaint has been resolved by [insert resolution – similar to above]

OR

After investigating your complaint, I have decided that no further action should be taken because [provide reasons, e.g. a reasonable resolution has already been offered and declined; application of the Advice & Casework Procedures]

If you are not satisfied that your complaint has been resolved

If you are not satisfied that your complaint has been resolved you may ask that your complaint be referred to the Principal Solicitor/Executive Director, or you may wish complaint to:

- the Office of the Legal Services Commissioner, ph: 1800 242 958
- the Office of the Australian Information Commissioner: https://www.oaic.gov.au/
- Legal Aid NSW: clcprogram@legalaid.nsw.gov.au

[delete as necessary]